

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

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U.S. DISTRICT COURT  
DISTRICT OF MASS.

RUSSELL F. SHEEHAN, as he is ADMINISTRATOR,  
ELECTRICAL WORKERS' HEALTH AND  
WELFARE FUND, LOCAL 103, I.B.E.W.;  
ELECTRICAL WORKERS' PENSION FUND,  
LOCAL 103, I.B.E.W.; ELECTRICAL WORKERS'  
SUPPLEMENTARY HEALTH AND WELFARE  
FUND, LOCAL 103, I.B.E.W.; ELECTRICAL  
WORKERS' DEFERRED INCOME FUND,  
LOCAL 103, I.B.E.W.; ELECTRICAL WORKERS'  
JOINT APPRENTICESHIP AND TRAINING  
FUND, LOCAL 103, I.B.E.W.; ELECTRICAL  
WORKERS' EDUCATIONAL AND CULTURAL  
FUND; ANTHONY J. SALAMONE, as he is  
ADMINISTRATOR, NATIONAL ELECTRICAL  
BENEFIT FUND; and LOCAL 103, INTERNATIONAL  
BROTHERHOOD OF ELECTRICAL WORKERS,

Plaintiffs

vs.

THIBAULT CONTROLS, LLC,  
Defendant

and

FLEET BANK,  
Trustee

C.A. No. 04-10282 RGS

**VERIFIED REQUEST TO ENTER DEFAULT**

Plaintiffs Russell F. Sheehan, as he is Administrator, Electrical Workers Health and Welfare Fund, Local 103, IBEW, et al, request the Clerk to enter the default of Thibault Controls, LLC (hereinafter "Thibault"). This request is made pursuant to Rule 55(a), Fed.R.Civ.P. In support of this request, the Plaintiffs say:

- 1) This action was filed on February 11, 2004.

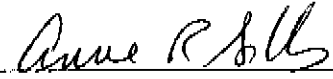
- 2) Complaint was served on defendant Thibault on April 15, 2004.
- 3) Thibault has never filed an Answer nor a responsive pleading to the Complaint.

WHEREFORE, plaintiffs seek the entry of Default in this matter.

Respectfully submitted,

RUSSELL F. SHEEHAN, as he is  
ADMINISTRATOR, ELECTRICAL  
WORKERS' HEALTH AND WELFARE  
FUND, LOCAL 103, et al,

By their attorneys,

  
\_\_\_\_\_  
Anne R. Sills, Esquire  
BBO #546576  
Segal, Roitman & Coleman  
11 Beacon Street  
Suite #500  
Boston, MA 02108  
(617) 742-0208

**VERIFICATION**

I, Anne R. Sills, verify that I have read this Verified Request to Enter Default and that the facts set out in the Request are true to the best of my knowledge and belief.

  
\_\_\_\_\_  
Anne R. Sills, Esquire

Dated: May 5, 2004

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above Verified Request to Enter Default has been served by first class mail upon Thibault Controls, LLC c/o John Leboe, Esquire at 6 Loudon Road, Concord, NH 03110 this 5<sup>th</sup> day of May, 2004.

  
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Anne R. Sills, Esquire